



August 22, 2017

Ms. Marlene H. Dortch, Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: CenturyLink QC and Nunn Telephone Company Joint Petition for Waiver
of the Definition of "Study Area" Contained in Part 36, Appendix-Glossary
of the Commission's Rules; CC Docket No. 96-45**

Dear Ms. Dortch,

This letter seeks to provide clarification regarding the above referenced petition and how Nunn Telephone Company (Nunn) estimates the cost to build out to all of the impacted locations as well as how the impact on USF is calculated.

CenturyLink was not providing any services to any of the locations impacted by the boundary line change. Further, no CenturyLink network assets are being transferred to Nunn. Four of the locations, all residential, now within Nunn's service area have requested FTTP service from Nunn. Nunn estimates that it will cost \$20,000 to build out to all four locations. This will add four lines that will take Voice and Data.

To estimate the impact on Nunn's USF, the investment and lines were added to the recently filed 2016 Cost Study. These additions raised the Common Line Annual Revenue Requirement by \$641 and Annual HCL Support \$7 for a total annual increase of \$648. The annual increase was divided by the four additional lines and by 12 months to come up with a total Monthly Change per month of \$13.50 per line per month. From this amount, the Monthly Subscriber Line Charge (SLC) of \$6.50 per line per month was subtracted to arrive at Total Federal High Cost Monthly Support per line of \$7.00. Please let us know if you have any further questions.

Sincerely,

Lori Sherwood
Director of Broadband Development

VANTAGEPNT.com 605-995-1777
2211 N Minnesota Street Mitchell SD 57301